

State Water Resources Control Board

July 8, 2019

Peter Husby
US EPA Region IX
1337 South 46th Street
Richmond, CA 94804

Dear Mr. Husby:

The California Environmental Laboratory Accreditation Program (CA ELAP) appreciates the opportunity to respond to the report on the November 27-28, 2018 audit of our Drinking Water Laboratory Certification Program. We take our responsibility to implement an effective drinking water laboratory accreditation program very seriously, and appreciate your staff members' time and suggestions for improvement. The purpose of this letter is to inform you of our plan to remedy the findings detailed in the report.

Onsite Assessment Backlog

Assessments Every Three Years: ELAP has created a Master Onsite Assessment List to help prioritize and assign onsite assessment assignments. This will help to ensure its onsite assessment process is followed and complies with USEPA's guidelines.

Missing Checklists from Onsite Laboratory Assessments

Inconsistencies in use of checklists: Appropriate training will occur for ELAP staff and ELAP will communicate to NV5 that ELAP Checklists should be used during onsite assessments prior to NV5 conducting future assessments. This will help to maintain consistency throughout the program.

Improper Citation of Drinking Water Regulations

Use of footnote referring to 22 CCR § 64415: ELAP has informed and trained staff regarding the use of this reference in the onsite assessment reports. A memo has been generated and is posted on ELAP's internal communications page.

Staffing and Resources

Re-evaluation of Assessment Strategy: ELAP will utilize a Master Onsite Assessment List to help prioritize and assign onsite assessment assignments. This list has already been created.

Resource Planning: ELAP is a fee-based program and funding to hire additional new staff comes at the discretion of the State Water Resources Control Board.

Third-Party Laboratory Assessors: Later this year, the State Water Resources Control Board will consider use of third-party laboratory assessors to assist in ELAP's assessment requirements.

Consistent Onsite Assessment Format: ELAP has directed its Onsite Assessment staff to follow the Standard Operating Procedure for Onsite Assessments to ensure a consistent format is followed

E. JOAQUIN ESQUIVEL, CHAIR | EILEEN SOBECK, EXECUTIVE DIRECTOR

among assessment staff. ELAP staff has been re-trained on this SOP.

Standardized Checklists: ELAP will ensure standardized checklists are being used by assessment staff and update its Standard Operating Procedure for Onsite Assessments, if necessary.

Onsite Assessment Reports and Corrective Action Plan Format: ELAP is currently utilizing a standard template for its Onsite Assessment and Corrective Action Plan reports to ensure that assessment staff are using the same template.

Laboratory Certification Officer (LCO) Training: ELAP will research training opportunities available for ELAP LCOs prior to NV5 shadowing ELAP assessment staff.

Define NV5 Assessor Shadow Process: ELAP will create a standardized form for NV5 to use to evaluate the performance of ELAP assessors. This will occur prior to the shadowing of ELAP assessors by NV5 staff. As always, final accreditation determination will be made by ELAP, and not by NV5 Assessor. Per contract requirements with NV5, no NV5 personnel is involved with any onsite assessment in which they have a financial interest in the outcome.

Partnering with CDPH Drinking Water and Radiation Laboratory: ELAP will maintain a working relationship with the Drinking Water and Radiation Laboratory at CDPH. Under the Division of Drinking Water Primacy contract, CDPH DW and Radiation Laboratory will provide technical training to ELAP staff.

Proficiency Testing Evaluation

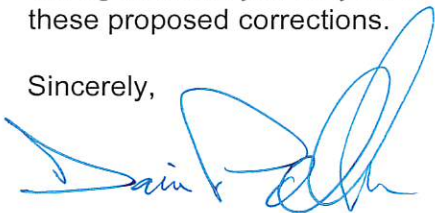
Proficiency Testing Database: ELAP staff have been engaged in the internal processes required to obtain a PT database for over two years and continue to work on this as a top priority.

Certification Documents

Reciprocity Certifications: ELAP is working with the Water Boards' Division of Information Technology (DIT) to modify the program's internal database to visually identify on the cover letter when accreditation has been granted via reciprocity, and to identify on the certification the primary state providing accreditation and the fields of testing accredited for. In addition, ELAP's regulations are in the process of being updated to require that the laboratory immediately notify ELAP when the accreditation has been revoked for any parameter by the primary authority, which would result in automatic loss of California ELAP accreditation for that parameter.

We again thank you for your time. Feel free to contact us if you have concerns regarding any of these proposed corrections.

Sincerely,



Darrin Polhemus, Deputy Director
Division of Drinking Water

cc: Corine Li, Drinking Water Office, Region 9 Pacific Southwest Region, USEPA
Andy Lincoff, USEPA Region 9 Laboratory, USEPA
Robert Brownwood, Assistant Deputy Director, Division of Drinking Water, SWRCB
Kimberly Niemeyer, Attorney, Office of Chief Counsel, SWRCB
Christine Sotelo, Chief, Environmental Laboratory Accreditation Program, SWRCB
Nickolaus Knight, Attorney, Office of Enforcement, SWRCB